

Fitzgerald & Associates, PC
Nicholas Fitzgerald Esq. NF/6129
649 Newark Avenue
Jersey City, NJ 07306-2303
(201) 533-1100
Email: nickfitz.law@gmail.com
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK

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In re:

Chapter 13

Chapter 13 Case No. 24-13654-VFP

Jose Carlos Garriga Bencomo

Date Case Filed: April 10, 2024

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**ATTORNEY'S RESPONSE TO SECURED CREDITOR'S [MORTGAGEE'S] OBJECTION
TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby responds to the mortgagee's objection to the confirmation of the debtor's Chapter 13 plan as follows:

1. The mortgagee objects to the debtor's plan on the grounds that the mortgage arrears are \$2,457.91 and not the estimated amount of zero dollars. The debtor's counsel **agrees** with the mortgagee that the full amount of the mortgage arrears of \$2,457.91 must be paid through the plan and that the plan and budget must be amended to provide for that claim.

2. Once the plan is amended, the creditor's objection that the plan does not comply with Section 1322 and 1325 will be overcome.

Dated: April 22, 2024



Nicholas Fitzgerald
Debtor's Counsel